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100 Atlanta Technology Center, Suite 120, 1575 Northside Drive, NW,
Atlanta, GA 30318 • (404) 352-4147 • FAX (404) 352-0659

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

MEMORANDUM

TO: Steve Spurlin, OSC
U.S. EPA, Region IV

FROM: Vicki S. Benfield
TAT, Region IV

THRU: Conley B. Phifer *CBP*
TATL, Region IV

SUBJECT: Montreal Court Drum Site
Tucker, Dekalb County, Georgia
TDD #04-9004-40-3216
40A-3266
TAT #04-F-04036

DATE: 13 June 1990

SITUATION

This report has been prepared in accordance with the requirements of Technical Direction Document (TDD) #04-9004-40, assigned to the Roy F. Weston Inc., Technical Assistance Team (TAT) by the U.S. Environmental Protection Agency (EPA).

TAT was tasked on three separate occasions by On-Scene Coordinator (OSC) Steve Spurlin to provide general technical assistance at the Montreal Court Drum Site located in Tucker, Dekalb County, Georgia. The site had previously been investigated by TAT on 10 January 1990 in which sampling was performed. A copy of the report detailing the investigation and analytical results can be found under TDD #04-9001-08-2987.

Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc.,
and R.E. Sarriera Associates

SUMMARY

On 25 April 1990, TAT members Dunbar and Laguaite mobilized to the site to complete the first round of the assigned tasks which was to determine if the drums and visqueen were still intact from the January 10 assessment. Upon arrival, TAT noted that the majority of the drums were uncovered, possibly due to wind and weather. Therefore, a combustible gas indicator (CGI) and photo ionization detector (PID) were field calibrated and both TAT members dressed out in level "C" personal protective clothing (PPE) to conduct real time air monitoring in the area around and directly above the drum openings. Neither the CGI, nor the PID detected any chemical vapors above background in the drum areas. TAT then proceeded to take photographs of the area and initiated re-covering the drums with visqueen to protect them from wind and precipitation. After recovering the drums, TAT departed the site and contacted OSC Spurlin to provide a verbal update on the site status.

The second visit to the site was on 23 May 1990. TAT Benfield returned to the Montreal Court Drum Site as requested by OSC Spurlin. TAT was tasked to completely document and monitor the activities of the ERCS crew who were sampling the drums for disposal analysis. Upon completion of drum sampling, the ERCS crew again covered the drums with visqueen. During this on-site activity, OSC Spurlin assigned ERCS the task of returning to the site and overpacking only the drums which were hazardous according to the analytical results.

On 30 May 1990, TAT Benfield returned to the site to monitor the overpacking activities of ERCS. In addition to overpacking the nine drums which contained hazardous materials, ERCS also updated the previous drum logs filled out by TAT on the nine hazardous drums. During this particular visit to the site, OSC Spurlin and TAT Benfield found a 30-gallon drum in the area that had not been present during the previous visit on 23 May 1990. ERCS sampled this particular drum and proceeded to overpack it, also. The sample is currently being analyzed for identification and disposal analysis. Upon the completion of the overpacking of the drums, the ERCS crew staged the overpacked drums and re-covered the remaining drums with visqueen.

CONCLUSION

At this time, the site is secure with the hazardous materials in overpacked drums. The remaining drums are also secured with a visqueen cover. OSC Spurlin is awaiting the disposal analysis information before final arrangements are made for removal of the drums.

ATTACHMENTS

Figure 1 - 3 Maps & Sketches

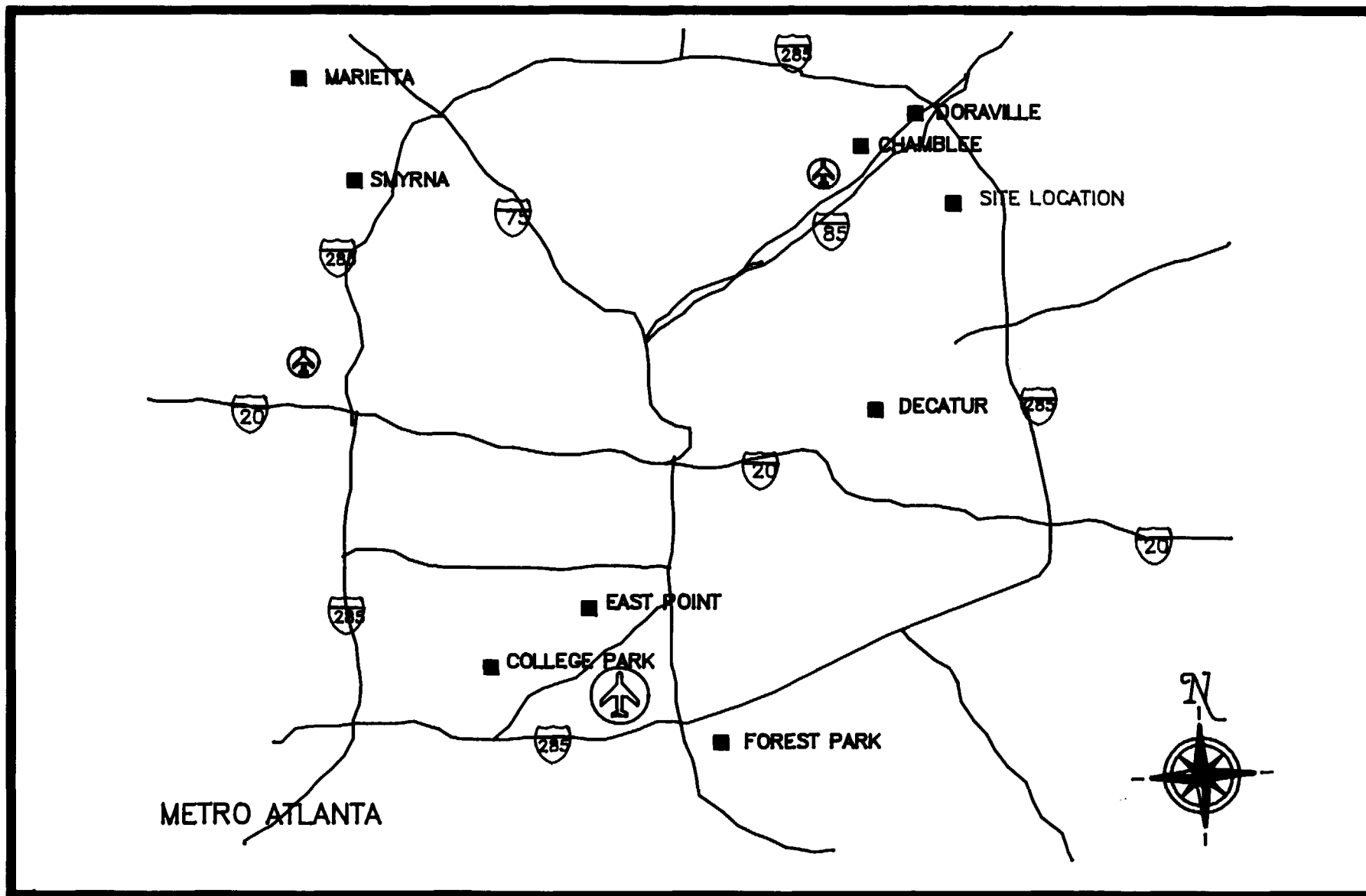
Attachment A - Photographs

B - Log Notes

C - Table of Witnesses

D - Safety Plan

Figure 1
General Site Map



WESTON MAJOR PROGRAMS REGION IV TAT

TAT Activity Description: Site Location Map

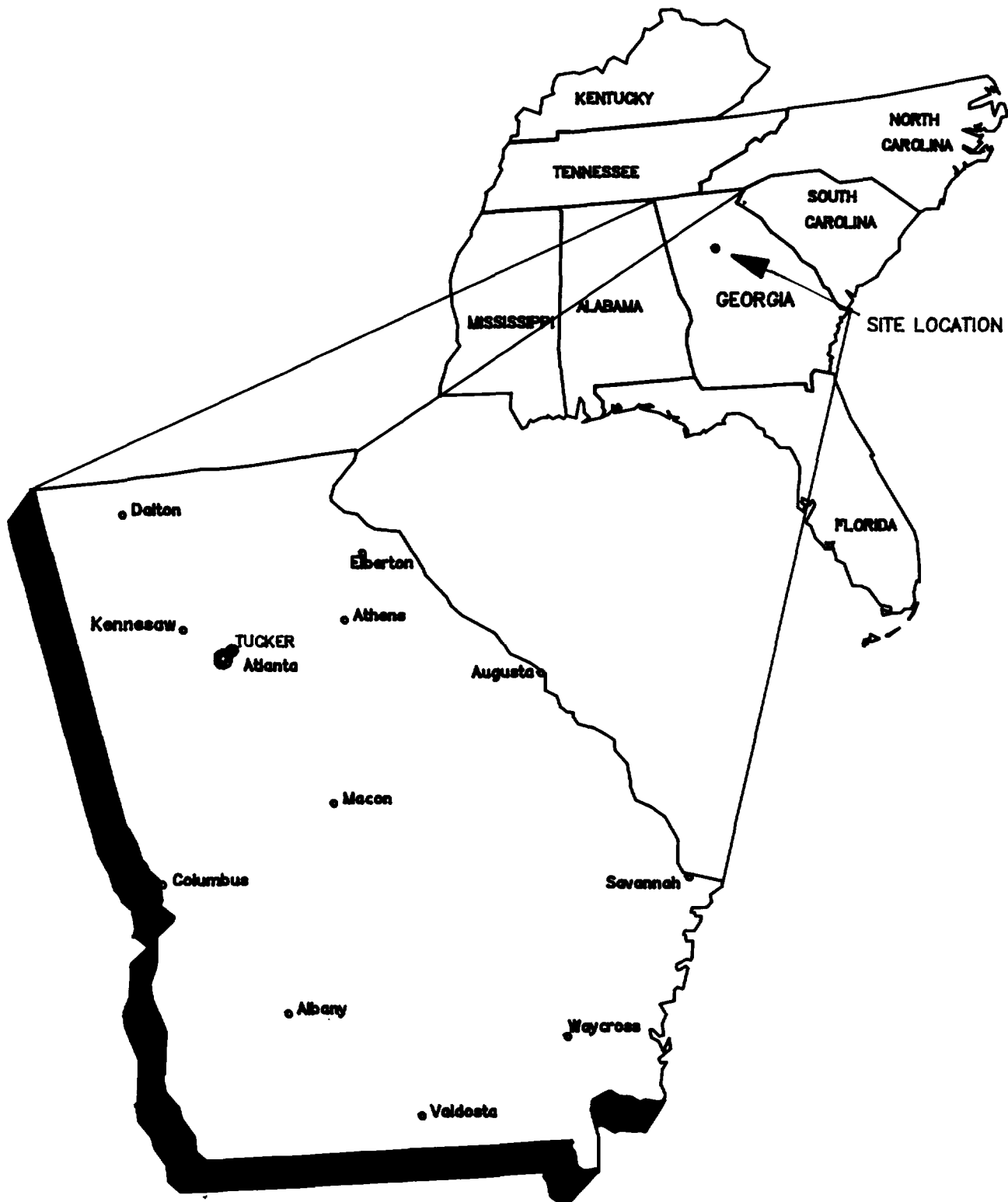
Tucker, DeKalb County, Georgia

SITE: Montreal Court Drum

TDD NO.: 04-9004-40-3216

DATE: 30 May 1990

Figure 2
Area Location Map



E.P.A. Region IV

General Site Location Map

TDD# 04-9004-40-3216

SITE NAME: MONTREAL DRUM

LOCATION: TUCKER, DEKALB COUNTY, GEORGIA



EPA

Figure 3
Site Diagram

1-285

MONTREAL COURT

building

new drum

boxcar

DRUM AREA

building

building

box car

N

SITE: MONTREAL COURT DRUM

TDD NUMBER: 04-9004-406-3266

DATE: 13 JUNE 1990

Attachment A
Photographs



PHOTO #3
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: White sludge material found
 in a drum which was sampled
 for compatibility.

Location: Montreal Drum Site, Tucker, GA
Photographer: J. Cole **Date:** 01/10/90
Film: Wolf **ASA:** 100 **Time:** 1015
TDD# 9001-08-2987 **Witness:** R. McKeen
Location of Negatives: Atlanta TAT Office

Copies



PHOTO #4
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: TAT sampling drum while
 monitoring for organic vapors.

Location: Montreal Drum Site, Tucker, GA
Photographer: J. Cole **Date:** 01/10/90
Film: Wolf **ASA:** 100 **Time:** 1040
TDD# 9001-08-2987 **Witness:** R. McKeen
Location of Negatives: Atlanta TAT Office



PHOTO #9
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: A variety of materials were found in the drums and subsequently sampled.

Location: Montreal Drum Site, Tucker, GA
Photographer: J. Cole **Date:** 01/10/90
Film: Wolf **ASA:** 100 **Time:** 1510
TDD# 9001-08-2987 **Witness:** R. McKeen
Location of Negatives: Atlanta TAT Office



PHOTO #10
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: Drum markings being noted on the drum log sheets.

Location: Montreal Drum Site, Tucker, GA
Photographer: J. Cole **Date:** 01/10/90
Film: Wolf **ASA:** 100 **Time:** 1540
TDD# 9001-08-2987 **Witness:** R. McKeen
Location of Negatives: Atlanta TAT Office



PHOTO #1
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: Initial view of site prior to
 ERCS sampling of drums.
Location: Montreal Court Drum
 Tucker, Dekalb Co., Georgia
Photographer: V. Benfield **Date:** 05/23/90
Film: 35mm **ASA:** 100 **Time:** 1200
TDD# 04-9004-40-3216 **Witness:**
Location of Negatives: Atlanta TAT Office



PHOTO #2
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: ERCS crew sampling drums.
Location: Montreal Court Drum
 Tucker, Dekalb Co., Georgia
Photographer: V. Benfield **Date:** 05/23/90
Film: 35mm **ASA:** 100 **Time:** 1235
TDD# 04-9004-40-3216 **Witness:**
Location of Negatives: Atlanta TAT Office



PHOTO #3
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: ERCS crew sampling drums.

Location: Montreal Court Drum
 Tucker, Dekalb Co., Georgia

Photographer: V. Benfield **Date:** 05/23/90

Film: 35mm **ASA:** 100 **Time:** 1300

TDD# 04-9004-40-3216 **Witness:**

Location of Negatives: Atlanta TAT Office

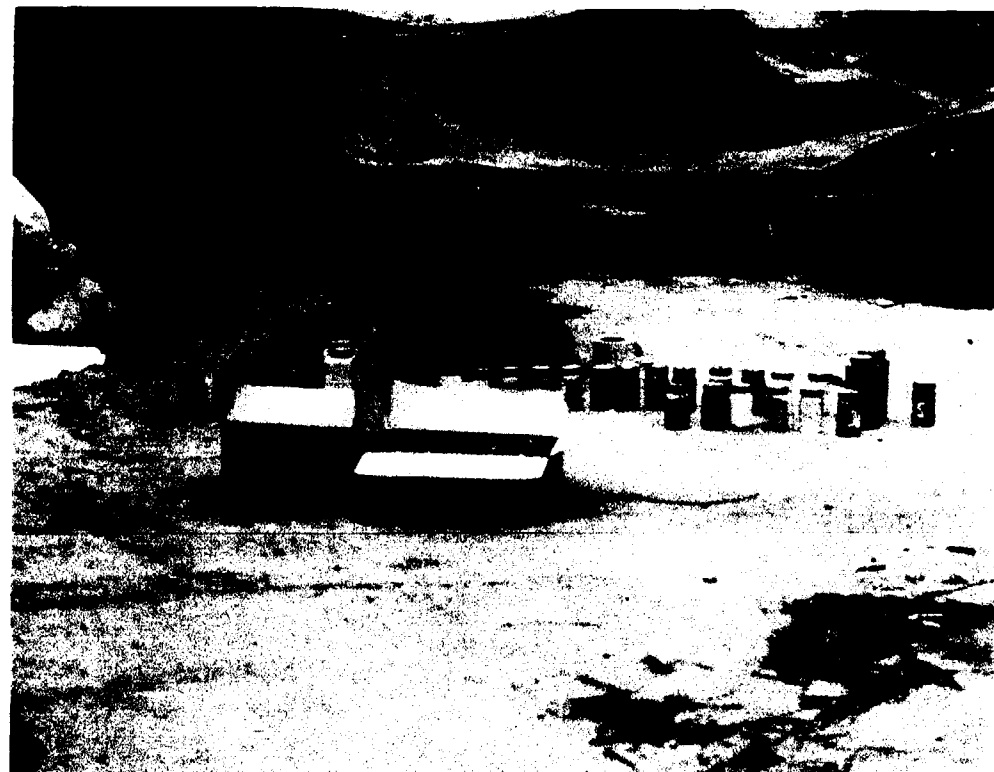


PHOTO #4
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: Samples that were taken by
 ERCS.

Location: Montreal Court Drum
 Tucker, Dekalb Co., Georgia

Photographer: V. Benfield **Date:** 05/23/90

Film: 35mm **ASA:** 100 **Time:** 1330

TDD# 04-9004-40-3216 **Witness:**

Location of Negatives: Atlanta TAT Office



PHOTO #5
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: ERCS crew covering and securing
the drums with visqueen and tape.
Location: Montreal Court Drum
Tucker, Dekalb Co., Georgia
Photographer: V. Benfield **Date:** 05/23/90
Film: 35mm **ASA:** 100 **Time:** 1345
TDD# 04-9004-40-3216 **Witness:**
Location of Negatives: Atlanta TAT Office

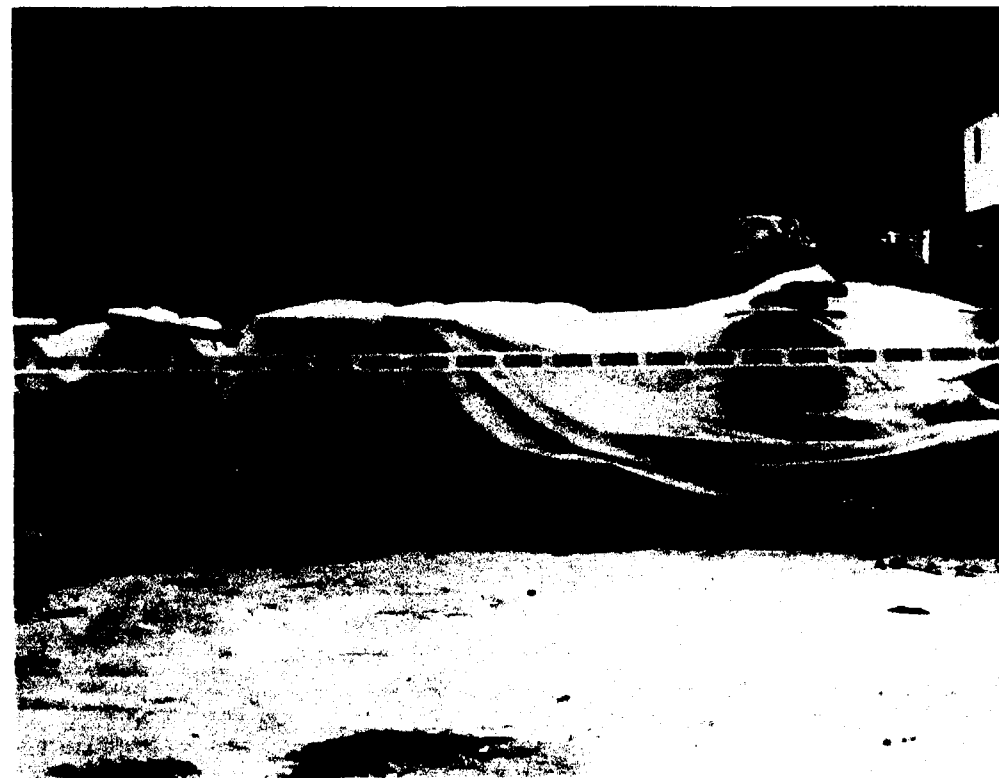


PHOTO #6
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: Secured area marked with
"Caution" warning tape.
Location: Montreal Court Drum
Tucker, Dekalb Co., Georgia
Photographer: V. Benfield **Date:** 05/23/90
Film: 35mm **ASA:** 100 **Time:** 1400
TDD# 04-9004-40-3216 **Witness:**
Location of Negatives: Atlanta TAT Office



PHOTO #7
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: ERCS crew establishing drum logs
 for hazardous drum.
Location: Montreal Court Drum
 Tucker, Dekalb County, Georgia
Photographer: V. Benfield **Date:** 05/30/90
Film: 35mm **ASA:** 100 **Time:** 1200
TDD# 04-9004-40-3266 **Witness:**
Location of Negatives: Atlanta TAT Office



PHOTO #8
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: ERCS crew overpacking hazardous
 drums.
Location: Montreal Court Drum
 Tucker, Dekalb County, Georgia
Photographer: V. Benfield **Date:** 05/30/90
Film: 35mm **ASA:** 100 **Time:** 1200
TDD# 04-9004-40-3266 **Witness:**
Location of Negatives: Atlanta TAT Office



PHOTO #9
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: Secured drums. Hazardous drums
 are overpacked on the left.
Location: Montreal Court Drum
 Tucker, Dekalb County, Georgia
Photographer: V. Benfield **Date:** 05/30/90
Film: 35mm **ASA:** 100 **Time:** 1345
TDD# 04-9004-40-3266 **Witness:**
Location of Negatives: Atlanta TAT Office



PHOTO #10
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: New found drum on-site. Notice
 the soil contamination.
Location: Montreal Court Drum
 Tucker, Dekalb County, Georgia
Photographer: V. Benfield **Date:** 05/30/90
Film: 35mm **ASA:** 100 **Time:** 1400
TDD# 04-9004-40-3266 **Witness:**
Location of Negatives: Atlanta TAT Office



**PHOTO #11
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY**

Subject: ERCS sampling new drum and
preparing it for overpacking.
Location: Montreal Court Drum
Tucker, Dekalb County, Georgia
Photographer: V. Benfield **Date:** 05/30/90
Film: 35mm **ASA:** 100 **Time:** 1410
TDD#04-9004-40-3266 Witness:
Location of Negatives: Atlanta TAT Office

Attachment B

Log Notes

25 April 90.

- 0830 Tat Member Dumban and Laguite Depart the Tat office Enroute. Montreal Court drum site.
- 0915 Tat arrived on site and observed that most of the drum were uncovered and need recovering. Tat calibrated the CGI and HNU-Pid.
- 0930 Both Tats Dress out in level "C" PPE with GMC-H Type Respirator cartridges. Tat carried out Entry into the drum area and conducted Realtime air monitoring around and above the drum opening. No reading above background were obtain out side the Head space or just ^{above} outside the drum openings. Tat carried out photo documentation.
- 0946 Tat Began recovering the drums with the Visqueen at the site. Most of the previously used visqueen was in torn and in good condition which contrary to wind and/or weather removing the Visqueen covers.
- 1010 Tat complete Recovering the Drums and continue photo documentation
- 1015 TAT Dressed down from level "C" and began securing equipment for departure.
- 1030 While removing the film from the camera, it was observed that the camera may have mechanically fail and the quality of the ~~the~~ photo was uncertain.

25 April 90.
1100 TAT had demobed from the site
and OSC Spurline was notified
of site activities.

25 April 90.
J. M. Clunker

23 May 1990

- 1130 ~~TH~~ Benfield leaves Atlantic TH office
for site to meet EPCS crew for
resample drums for disposal options
1200 Arrive on-site. EPCS crew is on-site.
TH discusses safety with crew and
tells them of the previous visit. RM
Rail Street Bus Division Manager
Dave Lee, TH discuss drum log.
That were taken at previous site.
EPCS prepares to go in and
sample the drums at level C with
drum legs in hand. Will be careful
and watch closely for breakthrough.
1230 EPCS crew of 3 samples goes in
with 2 others remaining out to
prepare sampling equipment and
sampling transferring equipment.
1300 RM Street Solis open Drum #11 because
it will not open with drum bung.
1330 Drum #37 is a blue, empty drum. Drum
#36 is full of activated. Drum #36,
which contains soil/sludge that was
contaminated from Drum #25, has a
PCB label on it which has an 'X' through
the label. EPCS continues to sample
the drums and find all numbered drums.
1345 EPCS crew begins collecting drums
individually with 17 square and securing
them with duct tape. TH, out and
location yellow tape around the entire
area.
1400 EPCS crew completes sampling of drums.

Remove hard CIPR. that is Begin to

pack-up area.

1420 Clean-up samples for packaging for transporting to the laboratory. Manager's car and 10RT leave site.

1430 OSC Spaulin arrives on-site. He talks with RM Street regarding the day's events and the necessity for a quick overpacking of the drums. EPCS RM Street advises the pros and cons of overpacking the drums before bulking versus the bulking before - 113 overpacking idea. RM Street recommends recommending immediate overpacking of the individual drums. OSC Spaulin calls CHM. T. Means to discuss the major pricing differences between the 2 processes.

1450 EPCS continues labeling and packing

Sample Plus.

1505 TH OSC Spaulin and RM Street ride over to the back area of the property to look at an area where CHM had spotted some drums while looking at the site.

The area has 3 drums in a small ravine. 2 drums appear to be a type of petroleum product. 1 is labeled MHPA, the other is labeled Marmac Corporation. OSC Spaulin sets one upright that is leaking slightly. The greatest concern is the water running in the ravine. It is

a milky - white color with a soapy appearance. OSC Spaulin states that it appears/looks like a later product. RM Street states that at 1200 hrs, when OTH just spotted the drums, the water ripples clear and didn't have the appearance that it currently has. We walk up the stream about 500 yds and are unable to find the source. OSC Spaulin says that he will follow-up on this problem. —

1545 Return to the site of the drums and talk about returning to the site on 29 May 1990 (Tuesday), to wrap up the drums ERCS crew, TAT/Bedford and possibly OSC Spaulin will return early Tuesday morning to the site. ERCS completes labeling of samples. RM Street tells OSC Spaulin that they (ERCS crew) brought 2 extra people for training purposes and that the people will not be chargeable to today's 1900-SSs. OSC Spaulin says that this is fine.

1600 TAT, OSC, ERCS depart site. —

~~File:
23 May 1990
Dyalla~~

30 May 1990

0930 PMT arrives on-site. ERCS crew, OSC
 Garslin on-site. ERCS crew is setting
 up area in preparation for overpacking
 of drums. RM Street states that the
 back-hoe trailer has a flat tire and
 that they are waiting for a man
 from Hix Stone to come out to the
 Corington Shop to fix it.

1000 After brief safety meeting held, the
 ERCS crew of E.O. Todd, Robinson,
 RT Sell, and RT Travis

dress in Level C PPE to get started
 on loading the 9 drums that will be
 overpacked and packing the drum
 logs for these particular drums only.
 The backhoe is suppose to arrive
 by 1100 hrs.

1015 Robinson and go in Level C
 PPE. Begin the new drum logs.

1045 RT Travis goes in to help.
 RM Street calls shop to check on the
 backhoe which should arrive at 1100.
 ERCS crew continues overpacking and
 making new drum logs.

1115 ERCS crew comes out of Level C
 and takes a short break. Waiting on
 backhoe still. ERCS crew fills out
 formal drum logs on the 9 drums.

1145 Backhoe arrives via HERTZ rental
 truck. RM Street discusses the necessity
 of sending one crew member to FVBS
 Doraville to pick up the bungs/rings/
 drums from a wholesale seller to

replace the ones that he took out of the
 Warehouse in Corington for this job.
 OSC Spurlin tells RM to check on the
 shipping costs for the materials instead
 of picking them up. RM Street and
 OSC Spurlin decide that shipping
 the items would be more cost effective
 after RM Street checks on the
 cost of shipping.

* 1200 ERCS begins overpacking drums.
 The rate on the backhoe from Hertz is
 \$42.50.

1230 ERCS continues overpacking the drums.
 OSC Spurlin and TAT Benfield find
 another drum behind the box car
 that is on-site. This particular drum
 appears to be waste oil that probably
 belongs to one of the companies on
 the property (i.e. drilling firm,
 bus repair service) OSC Spurlin asks
 TAT Benfield to call the Atlanta TAT
 office and send someone out with
 sampling equipment so ERCS can
 sample the liquid. In the meantime,
 OSC Spurlin attempts to find the
 party responsible for the drum of oil.
 OSC Spurlin orders ERCS to sample
 the material and to have it delivered to
 the laboratory and overpack the drum
 of oil (30 gallon drum).

1245 OSC Spurlin off-site, ERCS crew completes
 overpacking of 9 drums. RM Street
 and F.O. Robinson go to small

creek that runs behind the 2 buildings at the North end of the property. The creek has 3 drums in it that appear to contain petroleum products. RM Street and E. C. Robinson upright the drums on the bank of the stream to keep them from leaking. Other 2 ERCS men cover the remaining drums with visqueen and secure them with duct tape.

1300 TAT McKeen arrives with sample jar for ERCS to sample drum. RM Street and E. O. Robinson sample drum and overpack it while other 2 ERCS crew members start to pack up the equipment.

1345 ERCS Crew completes overpacking drum, staging, securing the area with "CAUTION" tape and packing up their equipment. RM Street contacts HERTZ Rental to pick up the Backhoe.

1400 ERCS Crews off-site. RM Street is to deliver sample to laboratory.

1415 TAT off-site after completing log book and taking pictures.

Accomplishments:

Overpacked drums #9
Overpacked new drum. Sampled new found drum.

5/30/90 Vicki Benfield

Attachment C
Table of Witnesses

Table of Witnesses

Steve Spurlin, OSC
U. S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365
(404) 347-3931

Vicki Benfield
Scott Dunbar
Keith Laguaite
Roy F. Weston, Inc.
Technical Assistance Team
1575 Northside Drive
Bldg. 100, Suite 120
Atlanta, GA 30318
(404) 352-4147

Attachment D
Site Safety Plan

SITE SAFETY PLAN AMENDMENT # 2 :

SITE NAME: Montreal Court Drum

DATE: 5/23/90

TYPE OF AMENDMENT: PPE Downgrade.

REASON FOR AMENDMENT: Based on analytical data and the task to be performed, documentation of ERCS crew working and photo-taking, Level D PPE would be sufficient.

ALTERNATE SAFEGUARD PROCEDURES: _____

REQUIRED CHANGES IN PPE: Level "D."

ERCS Response Manager (Date)

Vicki L. Benfield 5/23/90
Weston Lead TAT Member (Date)

ERCS Safety Officer (Date)

Victoria M. Kincaid 5/23/90
Weston RSO (Date)

U.S. EPA OSC (Date)

U.S. EPA Safety Officer (Date)

SITE SAFETY PLAN AMENDMENT # 1 : _____

SITE NAME: MONTREAL DRUM

DATE: 4/24/90

TYPE OF AMENDMENT: PPE Down grade.

REASON FOR AMENDMENT: Base on analytical data and
Real-time air monitoring and task to be performed:
Recover Drum with Vasequeen and take photos

ALTERNATE SAFEGUARD PROCEDURES: _____

REQUIRED CHANGES IN PPE: Level "C" APR- with GMC-H
cartridges

ERCS Response Manager (Date) ERCS Safety Officer (Date)

Weston Lead TAT Member (Date) Kathleen M. Kenny 24 April 90
Weston RSO (Date)

U.S. EPA OSC (Date) U.S. EPA Safety Officer (Date)

WESTON SPER DIVISION
HAZARDOUS WASTE SITE INVESTIGATION AND EMERGENCY RESPONSE
HEALTH AND SAFETY PLAN

U.S. EPA CONTACT: STEVE SPURLIN
Date of Inspection: 4/25/90 Time: _____ TDD No. 04-9004-40
Original Safety Plan: Yes _____ No ☒ PCS No. 3216
Admendment/Modification No. _____

SITE SAFETY COORDINATOR: S. DUNBAR

Site Name: Montreal Drum Site Tucker, GA

Site Address: Street No. 1804 Montreal Court
City Tucker
County DeKalb
State GA Zip Code 30345

Site Contact: _____ Phone _____

Directions to Site: (Attach Map) From TAT office - 85N to Kevista Rd exit east, to Montreal Rd, south, east on Montreal Circle which turns into Montreal Ct.

SITE HISTORY: _____

INCIDENT DESCRIPTION

TYPE: A) Spill _____ Air Release _____ Fire _____ HW Site ☒ Other _____
B) Assessment _____ Sampling ☒ Emergency Response _____
Clean-up/Removal _____ Other (specify) _____
C) Urban/Residential _____ Commercial _____ Industrial ☒
Rural _____ Remote _____

PERSONNEL PHYSICAL SAFETY HAZARDS:

Heat _____ Cold ☒ Noise _____ Underground Utilities _____
Overhead Utilities _____ Heavy Equipment _____ Slip, Trip, Fall ☒
Confined Spaces _____ Pressurized Airlines _____ Explosive _____
Ladders _____ Scaffolds _____ Unguarded Openings-Wall, Floor _____
Liquids in Open Containers, Ponds/Lagoons ☒
Other _____

CHEMICAL CONTAMINANTS OF CONCERN

CONTAMINANT	TLV PEL	IDIH	PHYSICAL CHARACTERISTICS	ROUTE OF EXPOSURE	SYMPTOMS OF ACUTE EXPOSURE	FIRST AID	INSTRUMENTS TO DETECT
Unknown organics suspected coatings and paint Related materials							Rad meter OVA CGT HNU

Description of Decontamination To Be Used: Alconox & water

SPECIFY PPE TYPE

TASK TO BE PERFORMED	ANTIC. LEVEL OF PROTECT.	COVERALL	GLOVE IN/OUT.	AIR PURIF RESPIRATOR CART/CANN
<u>Drum Sampling</u>	<u>B</u>	<u>Saranex</u>	<u>Latex / Nitrile / Stone</u>	<u>SCBA</u>
<u>Soil excavating</u>	<u>B</u>	<u>"</u>	<u>Butyl / Silver Shield</u> <u>or Viton</u>	<u>"</u>

Anticipated Monitoring

Radiation Meter ☒ CGI ☒ HNU ☒ ^(weather purifying) 10.2 eV Probe OVA ☒

Detector Tube [] _____ Other _____
 EMERGENCY PHONE NUMBERS: LOCATION PHONE NOTIFIED

FIRE 911

POLICE 911

AMBULANCE 911

HOSPITAL Dekalb Medical Center 297-5350 - Emergency "MS Mahoney"

CHEMICAL TRAUMA CAPABILITY? Yes

DIRECTIONS TO HOSPITAL: (ATTACH MAP) RTE. VERIFIED BY J.C. DATE 1/4/89

Dekalb Medical Center - Take Montreal Court south to Fern Drive Left on
Fern Dr to Lawrenceville Hwy (71529). Right on 71529 (South) to 715A Business
Left Fork of Scott Blvd intersections Left on to N. Decatur Rd
Rt turn into hospital (See attached map - high lighted in yellow)
 ADDITIONAL EMERGENCY PHONE CONTACTS:

CHEMTREC	(800) 424-9300
TSCA HOTLINE	(800) 424-9065, (202) 544-1404
ATSDR	(DAY) (404) 329-2888
	(NIGHT) (404) 566-7777
AT & F (EXPLOSIVES INFO.)	(800) 424-9555
NATIONAL RESPONSE CENTER	(800) 424-8802
WESTON MEDICAL EMERGENCY SERVICE	(513) 421-3063
WESTON 24 HOUR HOTLINE	(215) 524-1925, 1926
PESTICIDE INFORMATION SERVICE	(800) 845-7633
EPA ERT EMERGENCY	(201) 321-6660
RCRA HOTLINE	(800) 424-9346
CMA CHEMICAL REFERRAL CENTER	(800) 262-8200
NATIONAL POISON CONTROL CENTER	(800) 942-5969
U.S. DOT	(202) 366-0656 (Day only)

Prepared by: [Signature] Date: 1/11/89

Pre-Response Approval by: KMK Date: 1/14/90

OBSERVED CONDITIONS/ACTIVITIES

Describe Initial Conditions (Source/Type/Quantity): SITE CONSISTS OF
APPROXIMATELY 35 DRUMS SCATTERED THROUGHOUT THE 1/3 ACRE PROPERTY. TWO LOCAL
BUSINESSES (DRILLING COMPANY & AUTO SHOP) ADJACENT TO THE PROPERTY. MOST OF THE
DRUMS ARE UPRIGHT AND APPEAR TO BE IN FAIR CONDITION. HOWEVER,
SOME HAVE OPEN TOES (NONE OR RUSTED). ACCORDING TO NERC REPRESENTATIVE
ON-SCENE, THE DRUMS CAME FROM A COMPANY LOCATED UP THE ROAD ON MOUNTAIN.

DOCUMENTATIONPERFORMED BY: RALPH McKEE / JOANNA COLE / VICKI BENFIELDType: Photo X Log Book X Recorder _____ Video _____**PHYSICAL DESCRIPTION**

Size of Site: 1/3 ACRE Topography _____
 Terrain: FLAT Weather Clear, warm high 50's

Distance to Nearest: Residence _____ School _____ Hospital _____

Public Building 50' Other _____Evacuation: Yes _____ No X Number _____ By Whom _____

Nearest Waterway: _____ Distance: _____

<u>Condition</u>	<u>Observed</u>	<u>Potential</u>	<u>None</u>
Surface Water Contamination	_____	<u>✓</u>	_____
Ground Water Contamination	_____	<u>✓</u>	_____
Drinking Water Contamination	_____	<u>✓</u>	<u>✓</u>
Air Contamination	_____	<u>✓</u>	_____
Soil Contamination	<u>✓</u>	_____	_____
Stressed Vegetation	_____	_____	<u>✓</u>
Dead Fish, Other Animals	_____	_____	<u>✓</u>

ACTIONS TAKEN ON SITE: (Attach Map of Site Control Zones)Was Entry Made by TAT: YES X NO _____**TASK CONDUCTED: Describe Specific PPE Used and Why**AIR MONITORING - INITIAL ENTRY MADE - LEVEL B - ON 3/2MASK C/G & C/ASampling - Level 'B' INSTRUMENTATION TRACED ORGANICCOMPOUNDS

AIR MONITORING LOG

OVA Calibration 17 ppm C2H
 HNU Calibration 1000 ppm NA1 - ABCD Route additional use w/ OVA only
 CGI Calibration 10% O₂ 20% LEL

Background O₂ 20.5%
 Organics 2 ppm SVT
 Radiation 0.2 mR/hr

CGI 20.5% O₂
0% LEL

(ATTACH CALIBRATION DATA TO LOG)

SITE NAME MONTREAL COURT

STATION/ LOCATION	DATE	TIME	NAME OF AIR MONITOR	TYPE OF EQUIPMENT (HNU (PROBE/SPAN), CGI, OVA, RAD MTR)	READING	SUMMARY/COMMENTS
Station 1	1/10/90	1000	MCKEN, Co/2	OVA RAD Meter CGI	3 ppm 0.2 mR/hr 20% O ₂ 0% LEL	THREE LEVELS READING BEYOND HEADSPACE OF CHAM. PLUM. INDICATING DRAIN REPAIRING AT CHAM. IS SATISFACT.
Station 201	1/10/90	1030	MCKEN	OVA CGI	2 ppm 20% O ₂ 0% LEL	
Station 202	1/10/90	1053	MCKEN	OVA CGI	3 ppm 20% O ₂ 0% LEL	
Station 203	1/10/90	1055	MCKEN	OVA CGI	3 ppm 20% O ₂ 0% LEL	
Station 204	1/10/90	1120	MCKEN	OVA CGI	> 1000 ppm 20% O ₂ 0% LEL	OFF SCALE ON X/100
Station 205	1/10/90	1130	MCKEN	OVA CGI	2 ppm 20% O ₂ 0% LEL	
Station 206	1/10/90	1145	MCKEN	OVA CGI	3 ppm 20% O ₂ 0% LEL	
Station 207	1/10/90	1155	MCKEN	OVA CGI	3 ppm 20% O ₂ 0% LEL	
Station 208	1/10/90	1200	MCKEN	OVA CGI	2 ppm 20% O ₂ 0% LEL	
Station 209	1/10/90	1210	MCKEN	OVA CGI	9 ppm 20% O ₂ 0% LEL	
Station 210	1/10/90	1225	MCKEN	OVA CGI	> 1000 ppm 20% O ₂ 0% LEL	OFF SCALE ON X/100

AIR MONITORING LOG

OVA Calibration _____
 INU Calibration _____
 OGI Calibration _____

Background O₂ _____
 Organics _____
 Radiation _____

PAGE 2

OGI _____

(ATTACH CALIBRATION DATA TO LOG)

SITE NAME MONTREAL COURT

STATION/ LOCATION	DATE	TIME	NAME OF AIR MONITOR	TYPE OF EQUIPMENT (INU (PROBE/SPAN), OGI, OVA, RAD MIR)	READING	SUMMARY/COMMENTS
P11	1/10/90	1230	M ^S K ^E N	OVA CGI	2 PPM 20.0% O ₂ CCL	
P12	1/10/90	1235	M ^S K ^E N	OVA CGI	3 PPM 20.5% O ₂ CCL	
P13	1/10/90	1240	M ^S K ^E N	OVA CGI	2 PPM 20.0% O ₂ CCL	
P14	1/10/90	1245	M ^S K ^E N	OVA CGI	1 PPM 20.0% O ₂ CCL	
P15	1/10/90	1246	M ^S K ^E N	OVA CGI	2 PPM 20.5% O ₂ CCL	
P16	1/10/90	1445	M ^S K ^E N	OVA CGI	2 PPM 20.0% O ₂ CCL	
P17	1/10/90	1455	M ^S K ^E N	OVA CGI	3 PPM 20.5% O ₂ CCL	
P18	1/10/90	1520	M ^S K ^E N	OVA CGI	2 PPM 20.5% O ₂ CCL	
P19	1/10/90	1505	M ^S K ^E N	OVA CGI	2 PPM 20.0% O ₂ CCL	
P20	1/10/90	1510	M ^S K ^E N	OVA CGI	2 PPM 20.0% O ₂ CCL	
P21	1/10/90	1516	M ^S K ^E N	OVA CGI	3 PPM 20.5% O ₂ CCL	
P22	1/10/90	1535	M ^S K ^E N	OVA CGI	2 PPM 20.0% O ₂ CCL	

AIR MONITORING LOG

OVA Calibration _____
 HNU Calibration _____
 CGI Calibration _____

Background O₂ _____
 Organics _____
 Radiation _____

PAGE 3

(ATTACH CALIBRATION DATA TO LOG)

CGI _____

SITE NAME MONTREAL COURT

STATION/ LOCATION	DATE	TIME	NAME OF AIR MONITOR	TYPE OF EQUIPMENT (HNU (PROBE/SPAN), CGI, OVA, RAD MIR)	READING	SUMMARY/COMMENTS
P-15	11/1/90	15:48	M ^{rs} KEEN	OVA CGI	2 PPM 4150% O ₂ LEL	
P-16	11/1/90	15:10	M ^{rs} KEEN	OVA CGI	—	DRUM EMPTY
P-17	11/1/90	16:00	M ^{rs} KEEN	OVA CGI	3 PPM 24.50% O ₂ LEL	
P-18	11/1/90	16:10	M ^{rs} KEEN	OVA CGI	> 1000 PPM 0% O ₂ LEL	OFF SCALE IN NOW
P-19	11/1/90	16:15	M ^{rs} KEEN	OVA	40 PPM	
P-20	11/1/90	16:30	M ^{rs} KEEN	OVA	2 PPM	
P-21	11/1/90	16:40	M ^{rs} KEEN	OVA	3 PPM	
P-22	11/1/90	17:30	M ^{rs} KEEN	OVA	30 PPM	SLUDGE/SLURRY FILLED DRUM 17-1

JOB SAFETY & HEALTH PROTECTION

The Occupational Safety and Health Act of 1970 provides job safety and health protection for workers by promoting safe and healthful working conditions throughout the Nation. Requirements of the Act include the following:

Employers

All employers must furnish to employees employment and a place of employment free from recognized hazards that are causing or are likely to cause death or serious harm to employees. Employers must comply with occupational safety and health standards issued under the Act.

Employees

Employees must comply with all occupational safety and health standards, rules, regulations and orders issued under the Act that apply to their own actions and conduct on the job.

The Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor has the primary responsibility for administering the Act. OSHA issues occupational safety and health standards, and its Compliance Safety and Health Officers conduct safety inspections to help ensure compliance with the Act.

Inspection

The Act requires that a representative of the employer and a representative authorized by the employees be given an opportunity to accompany the OSHA inspector for the purpose of aiding the inspection.

Where there is no authorized employee representative, the OSHA Compliance Officer must consult with a reasonable number of employees concerning safety and health conditions in the workplace.

Complaint

Employees or their representatives have the right to file a complaint with the nearest OSHA office requesting an inspection if they believe unsafe or unhealthful conditions exist in their workplace. OSHA will withhold, on request, names of employees complaining.

The Act provides that employees may not be discharged or discriminated against in any way for filing safety and health complaints or for otherwise exercising their rights under the Act.

Employees who believe they have been discriminated against may file a complaint with their nearest OSHA office within 30 days of the alleged discrimination.

Citation

If upon inspection OSHA believes an employer has violated the Act, a citation alleging such violations will be issued to the employer. Each

citation will specify a time period within which the alleged violation must be corrected.

The OSHA citation must be prominently displayed at or near the place of alleged violation for three days, or until it is corrected, whichever is later, to warn employees of dangers that may exist there.

Proposed Penalty

The Act provides for mandatory penalties against employers of up to \$1,000 for each serious violation and for optional penalties of up to \$1,000 for each nonserious violation. Penalties of up to \$1,000 per day may be prepared for failure to correct violations within the proposed time period. Also, any employer who willfully or repeatedly violates the Act may be assessed penalties of up to \$10,000 for each such violation.

Criminal penalties are also provided for in the Act. Any willful violation resulting in death of an employee, upon conviction, is punishable by a fine of not more than \$10,000, or by imprisonment for not more than six months, or by both. Conviction of an employer after a first conviction doubles these maximum penalties.

Voluntary Activity

While providing penalties for violations, the Act also encourages efforts by labor and management, before an OSHA inspection, to reduce workplace hazards voluntarily and to develop and improve safety and health programs in all workplaces and industries. OSHA's Voluntary Protection Programs recognize outstanding efforts of this nature.

Such voluntary action should initially focus on the identification and elimination of hazards that could cause death, injury, or illness to employees and supervisors. There are many public and private organizations that can provide information and assistance in this effort, if requested. Also, your local OSHA office can provide considerable help and advice on solving safety and health problems or can refer you to other sources for help such as training.

Consultation

Free consultative assistance, without citation or penalty, is available to employers, on request, through OSHA supported programs in most State departments of labor or health.

More Information

Additional information and copies of the Act, specific OSHA safety and health standards, and other applicable regulations may be obtained from your employer or from the nearest OSHA Regional Office in the following locations:

Atlanta, Georgia
Boston, Massachusetts
Chicago, Illinois
Dallas, Texas
Denver, Colorado
Kansas City, Missouri
New York, New York
Philadelphia, Pennsylvania
San Francisco, California
Seattle, Washington

Telephone numbers for these offices, and additional area office locations, are listed in the telephone directory under the United States Department of Labor in the United States Government listing.

Washington, D.C.
1985
OSHA 2203



William E. Brock, Secretary of Labor

U.S. Department of Labor
Occupational Safety and Health Administration



Under provisions of Title 29, Code of Federal Regulations, Part 1903.2(a)(1) employers must post this notice for a facsimile in a conspicuous place where notices to employees are customarily posted.

